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Attorney for Plaintiff, Officer Christopher Leary

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHRISTOPHER LEARY,

Plaintiff,

v.

EGG HARBOR TOWNSHIP POLICE
DEPARTMENT, THE TOWNSHIP
OF EGG HARBOR, MAINLAND
LOCAL PBA #77, NEW JERSEY
STATE ASSOCIATION OF CHIEFS
OF POLICE, STATE OF NEW
JERSEY, MICHAEL HUGHES,
INDIVIDUALLY AND ACTING
UNDER COLOR OF LAW,
WILLIAM NALLY, INDIVIDUALLY
AND ACTING UNDER COLOR OF
LAW, JEFFERY LANCASTER,
INDIVIDUALLY AND ACTING
UNDER COLOR OF LAW,
REYNOLD THERIAULT,
INDIVIDUALLY AND ACTING
UNDER COLOR OF LAW DONNA
L. MARKULIC, INDIVIDUALLY
AND ACTING UNDER COLOR OF
LAW, JOHN AND JANE DOES 1-10,
ABC CORPORATIONS, AND XYZ
STATE ENTITIES.

Defendants.

**CERTIFICATION OF
COUNSEL IN SUPPORT
OF MOTION FOR LEAVE
TO AMEND PLAINTIFF'S
COMPLAINT**

Civil Action No.:
1:23-cv-04070-JHR-SAK

Phyllis Widman, of full age, certifies as follows:

1. I am an attorney-at-law licensed to practice before this Court and owner of Widman Law Firm, LLC.
2. My firm represents Plaintiff, Christopher Leary in the above captioned matter. As such, I am fully familiar with the facts herein. I make this Certification in support of Plaintiff's Motion for Leave to Amend the Complaint.
3. Attached hereto are true and accurate copies of the following:

EXHIBIT	DESCRIPTION
1	Proposed Amended Complaint
2	Affidavit of Robert A. O'Donoghue II
3	Affidavit of Ernest Dunson
4	Email Between Co-Defendants
5	Email from Ray Theriault to Ernest Dunson & Christopher Leary
6	Steph Three Grievance Response
7	Letter From Union Attorney

I hereby certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

WIDMAN LAW FIRM, LLC
Attorneys for Plaintiff, Christopher Leary

/s/ Phyllis Widman
Phyllis Widman

Dated October 23, 2023